

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA, <i>ex rel.</i> INTEGRA MED ANALYTICS LLC,  Plaintiff,  v.  ISAAC LAUFER, <i>et al.</i> ,  Defendants.	<b>Case No. 17 Civ. 9424 (CS)</b>
UNITED STATES OF AMERICA,  Plaintiff,  v.  ISSAC LAUFER, <i>et al.</i> ,  Defendants.	

**NOTICE OF MOTION TO DISMISS THE COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law submitted by Defendant Tami Whitney in Support of Motion to Dismiss the Complaint, dated October 28, 2021, Defendant Tami Whitney will move this Court, before the Honorable Cathy Seibel, United States Judge for the Southern District of New York, on a date to be determined by the Court for an Order to dismiss the Government's Complaint-in-Intervention (Dkt. No. 13) under Fed. R. Civ. P. 9(b) and 12(b)(6).

Dated: New York, New York  
October 28, 2021

Respectfully submitted,

**GLENN AGRE BERGMAN & FUENTES LLP**

By: /s/ Michael Paul Bowen  
 Michael Paul Bowen ([mbowen@glenngre.com](mailto:mbowen@glenngre.com))  
 Edward E. Shapiro ([eshapiro@glenngre.com](mailto:eshapiro@glenngre.com))  
 55 Hudson Yards  
 New York, New York 10001  
 Tel: (212) 358-5600

*Attorneys for Defendant Tami Whitney*

CC:

<p>Jacob Bergman    Phone: 212-637-2776    Danielle Levine    Phone: 212-637-2689    United States District Attorney's Office,    Southern District of New York    86 Chambers Street    New York, NY 10007  <a href="mailto:Jacob.bergman@usdoj.gov">Jacob.bergman@usdoj.gov</a>  <a href="mailto:Danielle.levine@usdoj.gov">Danielle.levine@usdoj.gov</a></p> <p><i>Counsel for Intervenor Plaintiff</i></p>	<p>Phillip Collins    Phone: 512-647-6106    Jeremy Wells    Phone: 512-647-6120    Reid Collins &amp; Tsai LLP    1301 S. Capital of Texas Hwy    Ste C-300    Austin, TX 78746    Fax: 512-647-6129  <a href="mailto:jcollins@rctlegal.com">jcollins@rctlegal.com</a>  <a href="mailto:jwells@reidcollins.com">jwells@reidcollins.com</a></p> <p>Yonah Jaffe    Reid Collins &amp; Tsai LLP    810 Seventh Avenue, Suite 410    New York, NY 10019    Phone: 212-946-9340  <a href="mailto:yjaffe@rctlegal.com">yjaffe@rctlegal.com</a></p> <p><i>Counsel for United States of America, ex rel.    Integra Med Analytics, LLC, Plaintiff</i></p>
<p>Jack W. Selden    Phone: 205-521-8472    J. Bradley Robertson    Phone: 205-521-8000    Bradley Arant Boult Cummings LLP    1819 Fifth Avenue South    Birmingham, AL 35203    Fax: 205-521-8800  <a href="mailto:brobertson@bradley.com">brobertson@bradley.com</a>  <a href="mailto:jselden@bradley.com">jselden@bradley.com</a></p>	<p>Miranda Hooker    Troutman Pepper Hamilton Sanders LLP    19th Floor, High Street Tower    125 High Street    Boston, MA 02110-2736    (617) 204-5160  <a href="mailto:Miranda.Hooker@Troutman.com">Miranda.Hooker@Troutman.com</a></p>

<p>Lyndsay E. Medlin  214 North Tryon Street, Ste 3700  Truist Center  Charlotte, NC 28202  Phone: 704-338-6000  Fax: 704-332-8858  <a href="mailto:lmedlin@bradley.com">lmedlin@bradley.com</a></p>	<p>Karli Cozen  Troutman Pepper  3000 Two Logan Square  18th And Arch Streets  Philadelphia, PA 19103  Phone: 215-981-4601  <a href="mailto:Karli.cozen@troutman.com">Karli.cozen@troutman.com</a></p>
<p>Jonathan J. Ferry  Bradley Arant Boult Cummings  214 North Tryon Street, Suite 3700  Truist Center  Charlotte, NC 28202  Phone: 704-338-6011  <a href="mailto:jferry@bradley.com">jferry@bradley.com</a></p>	<p><i>Counsel for Defendants Long Island Care Center, Inc. and Forest Manor Care Center, Inc.</i></p>
<p>Kristina Reliford  Bradley Arant Boult Cummings  1600 Division Suite 700  Nashville, TN 37203  Phone: 615-252-3573  Fax: 615-252-6380  <a href="mailto:kreliford@bradley.com">kreliford@bradley.com</a></p>	
<p><i>Counsel for Defendants Excel at Woodbury for Rehabilitation and Nursing LLC; East Rockaway Center LLC d/b/a Lynbrook Restorative Therapy and Nursing; Oasis Rehabilitation and Nursing LLC; Suffolk Restorative Therapy &amp; Nursing LLC d/b/a Momentum at South Bay for Rehabilitation and Nursing; Treetops Rehabilitation &amp; Care Center LLC d/b/a North Westchester Restorative Therapy and Nursing Center; Quantum Rehabilitation and Nursing LLC; and Surge Rehabilitation and Nursing LLC</i></p>	
<p>The Health Law Partners, P.C. d/b/a  The Dresevic, Iwrey, Kalmowitz &amp;  Pendleton Law Group  Jonathan C. Messina  15 West 38th Street, 4th Floor, Ste. 735  New York, NY 10018  Phone: 516-492-3390  Fax: 516-492-3389  <a href="mailto:jmessina@thehlp.com">jmessina@thehlp.com</a></p>	<p>Jordan Brooks  Cuddy &amp; Feder LLP  445 Hamilton Avenue, 14th Floor  White Plains, New York 10601  Phone: 914-761-1300  Fax: 914-761-5372  <a href="mailto:JBrooks@cuddyfeder.com">JBrooks@cuddyfeder.com</a></p>

<p>Abby Pendleton Clinton Mikel The Health Law Partners, P.C. 32000 Northwestern Highway, Suite 240 Farmington Hills, MI 48334 Phone: 248-996-8510 Fax: 248-996-8525 <a href="mailto:apendleton@thehlp.com">apendleton@thehlp.com</a> <a href="mailto:cmikel@thehlp.com">cmikel@thehlp.com</a></p> <p><i>Counsel for Defendant Sutton Park Center for Nursing &amp; Rehabilitation, LLC</i></p>	<p>Brendan Goodhouse Cuddy &amp; Feder LLP 445 Hamilton Avenue White Plains, NY 10601 Phone: 914-761-1300 Fax: 914-761-5372 <a href="mailto:bgoodhouse@cuddylaw.com">bgoodhouse@cuddylaw.com</a></p> <p><i>Counsel for Defendant Montclair Care Center Inc.</i></p>
<p>Aaron M. Katz Ropes &amp; Gray LLP 800 Boylston Street Boston, MA 02199 Phone: 617-951-7117 <a href="mailto:Aaron.katz@ropesgray.com">Aaron.katz@ropesgray.com</a></p> <p><i>Counsel for Isaac Laufer, Intervenor Defendant</i></p>	<p>Aaron Lichtman P.O. Box 370, 56 Westchester Avenue Pound Ridge, New York 10576 Tel: (914) 232-1005 <a href="mailto:lichtman@outsidetbb.com">lichtman@outsidetbb.com</a></p> <p><i>Counsel for Defendant Paragon Management SNF LLC</i></p>